April , 2004

Doug Campbell, Chief
Operating Permits Section
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Campbell:

RE: Mid-American Energy Co., - Louisa, Muscatine, Iowa

On March 31, 2004, we received a copy of the Title V Operating Permit renewal application including the Compliance Assurance Monitoring (CAM) Plan required by 40 CFR Part 64 for a number of Mid-American Energy facilities including the Louisa Station in Muscatine. A cursory review indicates that as submitted these CAM plans do not appear to meet the minimum requirements for approval.

The format selected by the applicant, which is to incorporate the Title V Operating Permit conditions for the units apparently subject to CAM, makes it difficult to determine which portions are intended to comprise the CAM plan. By including all of the permit requirements for the selected emission units in the CAM plan, it is unclear which pollutants are actually subject to CAM.

For the Utility Boiler (EU-1), the CAM plan includes limits for opacity, particulate matter, nitrogen oxides, and sulfur dioxides. However, the only controls listed are an electrostatic precipitator (ESP) and low NOx burners. Part 64 excludes low-NOx burners from control devices, so it appears that CAM would be applicable only for the particulates controlled by the ESP on the boiler. The CAM plan should clearly indicate whether or not this is a large pollutant-specific emission unit (PSEU), *i.e*., PSEU is "large" if the post control emissions of PM are more than 100 tons per year, since the requirements for large and other PSEUs are different.

What kinds of monitoring devices are ME1, ME2, ME3, ME4, ME5 and ME6 listed in the section applicable to the boiler? What pollutant does each monitor? Which ones are part of the CAM plan? Under the heading **Continuous Emissions Monitoring**, in addition to the continuous opacity monitoring system (COMS), continuous emissions monitors are listed for SO2 and NOx. Why are these part of the CAM plan?

Under the heading **Electrostatic Precipitator Monitoring Guidelines**, excursion should be defined specifically for this unit and device. As submitted, the CAM plan states that "corrective action" will be taken "during periods of excursion where the indicators are out of range." What are the indicators, and what are the actual ranges for each. What is the margin of

compliance for the ranges selected?

The CAM plan also lists the following units as being subject to CAM: the coal dumper houses, the coal crusher house, the east and west coal silos and the transfer tower for coal conveying. A clear indication of the post-control emissions of these units should be indicated, and a conclusion as to whether or not they qualify as "large" PSEUs. The control device is a baghouse. There are several example CAM plans in the guidance for baghouses.

Using a tabular summary, as proposed in the CAM Guidance Manual is a good way to ensure that all items of information are included and clearly expressed in the CAM plan. An example is attached. We are also enclosing a copy of EPA's "presumptively acceptable" CAM plan for an ESP controlling particulate matter from a coal-fired boiler.

We have not reviewed the other Mid-America Energy CAM plans submitted, but we assume that these comments are applicable to them as well. If you have any questions regarding these comments, please do not hesitate to contact Harriett Jones, of my staff, at (913) 551-7730, or jones.harriett@epa.gov.

Sincerely,

JoAnn Heiman, Acting Branch Chief
Air Permitting and Compliance Branch
Air, RCRA, and Toxics Division

Enclosures

APCO	APCO	APCO
Jones	Burns	Heiman